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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.  
PARDINI IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS MOTION TO  
EXCLUDE DEFENDANTS'  
DAMAGES EXPERT  
WALTER BRATIC (DKT. 2275)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm  
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal  
4 knowledge and if called as a witness, I could and would competently testify to the matters set  
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion  
6 to File Under Seal Its Motion to Exclude Defendants' Damages Expert Walter Bratic (Dkt. 2275).

7 2. I have reviewed the following documents and confirmed that only the portions  
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 2 to Waymo's Motion	Entire Document

12 3. Exhibit 2 to Waymo's Motion is an expert report containing highly confidential  
13 information regarding Uber's financial forecasts, market assumptions, development timeline  
14 estimates, and strategic business considerations. It also contains internal company presentations  
15 and documents regarding this same highly confidential information, including business operating  
16 details and pricing strategy. In addition, Exhibit 2 contains highly confidential information  
17 regarding a business agreement, including specific financial and commercial terms of the  
18 agreement. I understand that disclosure of this information could allow competitors to acquire  
19 insight into detailed information about Uber's business strategy, internal market assumptions,  
20 finances, technical development, business agreements, and development timeline, allowing  
21 competitors to tailor their own business strategy to the detriment of Uber.

22 4. Defendants' request to seal is narrowly tailored to the portions of Waymo's  
23 Motion and supporting exhibits that merit sealing.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st  
25 day of December, 2017 at San Francisco, California.

26  
27 /s/ Thomas J. Pardini  
Thomas J. Pardini  
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